

# Federal Defenders OF NEW YORK, INC.

Southern District  
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January 31, 2020

**BY ECF**

Hon. Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Schulte*, S2 17 Cr. 548 (PAC)**

Dear Judge Crotty:

In response to the government's classified submission earlier today, and for the reasons cogently stated by Judge Ellis in *United States v. Rosen*, 487 F. Supp. 2d 703, 707-21 (E.D. Va. 2007), the defense continues to object to any trial exhibits (including, especially, documents that have long been publicly available on WikiLeaks.org) being shown to the jury in one form but disclosed to the public in a different form (or withheld from the public altogether). Allowing the government to proceed in the manner it proposes would not only violate CIPA, but would deny Mr. Schulte his constitutional rights to a fair and public trial.

Respectfully submitted,

/s/  
Edward S. Zas & Sabrina P. Shroff  
*Counsel for Joshua A. Schulte*